

EXHIBIT A

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

☐ FEPA

☒ EEOC 453-2023-00140

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

Dr. Cara Wessels Wells

Home Phone (Incl. Area Code)

(281) 728-0491

Date of Birth

02/1991

Street Address

220 Barton Creek Drive

City, State and ZIP Code

Dripping Springs, TX 78620

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two are named, list under PARTICULARS below.)

Name

Texas Tech University

No. Employees, Members

> 1,000

Phone No. (Incl. Area Code)

Street Address

2500 Broadway

City, State and ZIP Code

Lubbock, TX 79409

Name

Dr. Samuel Prien

No. Employees, Members

Phone No. (Incl. Area Code)

(806) 743-2047

Street Address

3601 4th Street, Stop 8340

City, State and ZIP Code

Lubbock, TX 79430

DISCRIMINATION BASED ON (Check appropriate box(es).)

☐ RACE☐ COLOR☒ SEX☐ RELIGION☐ NATIONAL ORIGIN☒ RETALIATION☐ AGE☐ DISABILITY☐ GENETIC INFORMATION☐ OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest
10/2012Latest
06/16/2022☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I. Throughout my time at Texas Tech University, I was subjected to harassment and systemic discriminatory conduct by Professor Prien, which was ignored and disregarded by the University despite the issue being brought to their attention several times. The harassment began in 2012 when I was an undergraduate student at TTU assisting in research in Professor Prien's lab and has continued through June of 2022 when I was removed as a mentor at my alma mater and was defamed by the department.

II. I faced a clear and noticeable pattern of harassment throughout my time at TTU serving as an undergraduate research assistant, Ph.D. student, lab coordinator, and program mentor. As an example, during annual trips to the American Society for Reproductive Medicine (ASRM) conference, Professor Prien insisted that we share a hotel room despite my discomfort with the suggestion. When I brought this to the attention of administrators at TTU, I was disregarded. The one instance in which I opted to stay with a family member instead, Professor Prien became visibly angry at me.

III. I expressed my discomfort with the arrangements and also reached out to administration for assistance, both avenues failed to help me. As a result of my clear discomfort, I faced retaliation from Professor Prien and the University. Prien said that he would "destroy" me in 2019. In the following three years, I made several attempts to bringing this issue to light to professors and administrators. Subsequently, I was removed from my listing as an inventor on TTU publications, removed as a mentor, and heard from a third party that they were instructed by TTU to not work with me. This disparagement of my character is a continuation of the harassment I have been subjected to for almost 10 years now.

IV. These are just a few examples of the inappropriate treatment I endured. This treatment was a result of my sex and my attempts to alert administration at TTU were disregarded due to my age and inferior position. The repeated harassment and cover up of inappropriate behavior have not only impacted my emotional and mental wellbeing, but also my professional reputation and employment opportunities.

V. I believe I have been discriminated against due to my sex, in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State or Local Agency Requirements

Kelly Christine Garcia
I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Cara Wells

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

(month, day, year)

11/09/2022

I declare under penalty of perjury that the above is true and correct.

11/09/2022

Date

Cara Wells

Charging Party Signature

